



August 22, 2023


VIA ECF

Judge Jennifer L. Rochon
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007
VyskocilNYSDCchambers@nysd.uscourts.gov

The request is GRANTED. Defendant shall respond to the attorneys' fees motion no later than **September 4, 2023**.

Dated: August 22, 2023
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

RE: Katrina Martin v. New American Cinema Group, Inc., et al.
Case No. 22-cv-5982-JLR

Dear Judge Rochon,

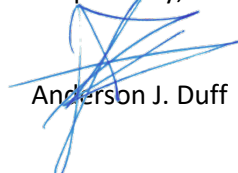
Defendant New American Cinema Group, Inc. ("NACG") hereby requests an extension of its time to respond to Plaintiff's motion seeking \$92,542 in attorneys' fees and \$572 in costs, which amount nearly eclipses NACG's annual revenue. (Mot. Fees Costs, ECF No. 51.) In an August 8, 2023 email, opposing counsel wrote "I know that you are out of town for the month. If Defendants need some additional time to respond to Plaintiff's *Motion for Attorney's Fees & Costs*, just let me know" The undersigned counsel has, for the entire month of August, been out of town staying with a family member who suffered a stroke. Plaintiff's counsel has agreed to a two-week extension of NACG's deadline to respond to Plaintiff's motion for attorneys' fees and costs.

In accordance with Your Honor's Individual Rules, NACG states as follows:

- (1) the original due date for NACG's Response was Monday, August 21, 2023, and NACG seeks to extend this deadline to **September 4, 2023**;
- (2) no previous requests for adjournment or extension of time have been filed;
- (3) no previous requests exist to be approved or denied;
- (4) Plaintiff's counsel consents to a two-week extension of NACG's deadline to respond.

Defendant NACG hereby seeks an order from the Court extending NACG's deadline to respond to Plaintiff's motion for fees and costs to Monday, September 4, 2023.

Respectfully,


Anderson J. Duff

AJD/jo